

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY, et al.

Defendants

CIVIL ACTION

No. 3:17-CV-2183-MEM

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**MOTION TO EXTEND FACT DISCOVERY DEADLINE**

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated April 10, 2018 (Doc. 14) entered by this Honorable Court, the fact discovery deadline in this matter is August 5, 2018.
2. Depositions in this matter are scheduled for August 15, 2018 and August 16, 2018, and it is anticipated another deposition day may be necessary.
3. Given the August 5, 2018 deadline, the Plaintiff is seeking to extend said fact discovery deadline sixty (60) days.
4. Via email on August 2, 2018, Plaintiff's counsel sought concurrence with this request. Opposing counsel concurs with Plaintiff's request.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the fact discovery deadline in this matter sixty (60) days.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire  
Bar I.D. # PA 49625  
gmk@mkpvlaw.com

/s/ Christopher J. Szewczyk, Esquire  
Bar I.D. # PA 306689  
cjs@mkpvlaw.com  
Mazzoni, Karam, Petorak, and  
Valvano  
321 Spruce Street  
Suite 201  
Scranton, PA 18503  
P: (570) 348-0776  
F: (570) 348-2755

Date: August 3, 2018

**CERTIFICATE OF CONCURRENCE**

The undersigned hereby certifies that on August 2, 2018, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion. Attorney Hailstone concurs in Plaintiff's request.

/s/ Christopher J. Szewczyk, Esquire  
Christopher J. Szewczyk, Esquire  
Mazzoni, Karam, Petorak, and  
Valvano  
321 Spruce Street  
Suite 201  
Scranton, PA 18503  
(570) 348-0776

Dated: August 3, 2018

**CERTIFICATE OF SERVICE**

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 3<sup>rd</sup> day of August, 2018.

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire